

EXHIBIT A

September 23, 2021

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1 A. I may have.
 2 Q. Sir, let me ask you, the Confederacy -- we're
 3 talking about the Confederacy at this point. Did the
 4 Confederacy have a national anthem?
 5 MS. FISHER: Objection.
 6 BY MR. CALLISTE:
 7 Q. Mr. Greene?
 8 A. I don't sing, but I don't know if Dixie is like
 9 the unofficial anthem. I don't know if that was the
 10 official.
 11 Q. And is the song called Dixie --
 12 MS. FISHER: Objection.
 13 BY MR. CALLISTE:
 14 Q. -- that you're referring to?
 15 A. I think so.
 16 Q. All right. You ever play that song in the
 17 Wenig Saltiel office, the Dixie song?
 18 MS. FISHER: Objection.
 19 THE WITNESS: I don't think so.
 20 BY MR. CALLISTE:
 21 Q. Sir, when you say you don't think so, do you
 22 recall specifically whether you ever played that -- that
 23 song, Dixie --
 24 A. No, I don't --
 25 MS. FISHER: Objection.

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1 THE WITNESS: -- recall if --
 2 MS. FISHER: You've got to --
 3 BY MR. CALLISTE:
 4 Q. -- at the Wenig Saltiel office?
 5 You're both trying to jump on the answer, but I
 6 need to finish my question first.
 7 A. No, I do not.
 8 Q. Okay. Sir, you ever play any music related to
 9 those events in the Wenig Saltiel office, those
 10 reenactments in the Wenig --
 11 MS. FISHER: Objection.
 12 BY MR. CALLISTE:
 13 Q. -- Saltiel office?
 14 A. Well, I listen to 19th century music from time
 15 to time in the office.
 16 Q. When you say 19th century music, sir, can you
 17 tell me the names of any 19th century songs or music that
 18 you have played in the office?
 19 MS. FISHER: Objection.
 20 THE WITNESS: Just popular songs of that era.
 21 BY MR. CALLISTE:
 22 Q. Okay. And can you tell me what songs you've
 23 played from that era in that office?
 24 MS. FISHER: Objection.
 25 THE WITNESS: I can remember The Vacant Chair.

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1 I had that.
 2 BY MR. CALLISTE:
 3 Q. Any other songs?
 4 A. Well, the anthem -- the songs that both armies
 5 sang, so Dixie and Johnny Comes Marching Home Again on
 6 the federal side.
 7 Q. Any others that you can recall?
 8 A. Bonnie Blue Flag. That's about it.
 9 Q. Okay. And are those -- those are songs that
 10 you listened to often?
 11 A. No.
 12 MS. FISHER: Objection.
 13 BY MR. CALLISTE:
 14 Q. Sir, can you tell me under what circumstances
 15 it was that you played those songs in the office, Wenig
 16 Saltiel?
 17 A. I didn't listen to music very often in the
 18 office. I used the office for work.
 19 Q. Right. My question was, under what
 20 circumstances would you play those songs that you just
 21 identified?
 22 A. I don't recall.
 23 Q. Okay. Could you tell me, sir, do you recall
 24 playing any of those songs in the Wenig Saltiel office in
 25 2018 or 2019?

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1 A. I can't remember.
 2 Q. Okay. You ever have any conversations with
 3 Ms. Fernandez about those songs?
 4 A. Never.
 5 Q. You ever play any of those songs for
 6 Ms. Fernandez?
 7 A. Never.
 8 Q. You ever play any of those songs while
 9 Ms. Fernandez was in the vicinity of your office?
 10 MS. FISHER: Objection.
 11 THE WITNESS: Never.
 12 BY MR. CALLISTE:
 13 Q. Okay. And, sir, when you played these songs in
 14 the office, how would you play these songs? In other
 15 words, did you have a device that you accessed that had
 16 these songs on them, or did you access the internet to
 17 get them? How did you -- how did you go about playing
 18 them?
 19 A. Probably through the computer.
 20 Q. When you say the computer, meaning the
 21 computer -- your desktop --
 22 A. Yeah.
 23 Q. -- computer?
 24 A. Yes, the desktop. You know, I take a break, I
 25 might listen to something, but ordinarily I -- that would

<p style="text-align: right;">Page 179</p> <p>1 MS. FISHER: Objection.</p> <p>2 THE WITNESS: Yes.</p> <p>3 BY MR. CALLISTE:</p> <p>4 Q. What social media sites do you use?</p> <p>5 MS. FISHER: Objection. You can answer.</p> <p>6 THE WITNESS: Facebook.</p> <p>7 BY MR. CALLISTE:</p> <p>8 Q. All right. Other than Facebook, did you use</p> <p>9 any other social media sites?</p> <p>10 A. That's all.</p> <p>11 Q. Okay. And, sir, in 2018 did you ever access</p> <p>12 Facebook from the office of Wenig Saltiel or while you</p> <p>13 were in the office at Wenig Saltiel?</p> <p>14 A. Yeah.</p> <p>15 Q. And how often did you do that?</p> <p>16 A. Not that often.</p> <p>17 Q. And how would you access Facebook while you</p> <p>18 were at the Wenig Saltiel office?</p> <p>19 A. I used the computer. I wouldn't use the</p> <p>20 phone --</p> <p>21 Q. Okay.</p> <p>22 A. -- I'd use the computer. It's faster.</p> <p>23 Q. So you would use the computer that was in that</p> <p>24 office?</p> <p>25 A. Well, not much.</p>	<p style="text-align: right;">Page 181</p> <p>1 A. I can't tell -- I don't know.</p> <p>2 Q. You ever get into any disagreements with</p> <p>3 Ms. Fernandez while you were in the office?</p> <p>4 A. I don't recall having a disagreement with her.</p> <p>5 Q. Okay. You ever get into any arguments with</p> <p>6 Ms. Fernandez in the office?</p> <p>7 A. I never had an argument with her.</p> <p>8 Q. Ms. Fernandez ever come to you and complain to</p> <p>9 you about any of your own conduct, let's say, in that</p> <p>10 office, in the Wenig Saltiel office?</p> <p>11 A. She never complained to me about anything</p> <p>12 personally.</p> <p>13 Q. Did Ms. Fernandez ever raise any concerns with</p> <p>14 you then about any conduct of your conduct in the office?</p> <p>15 A. No.</p> <p>16 MR. BINIAKEWITZ: (Inaudible).</p> <p>17 THE COURT REPORTER: Someone is speaking, and I</p> <p>18 can't understand them.</p> <p>19 MR. CALLISTE: Yeah.</p> <p>20 MR. BINIAKEWITZ: Oh, I'm sorry. I was talking</p> <p>21 to my daughter. I'm sorry. I thought I was on</p> <p>22 mute.</p> <p>23 BY MR. CALLISTE:</p> <p>24 Q. Sir, with regard to Facebook, do you still use</p> <p>25 Facebook today?</p>
<p style="text-align: right;">Page 180</p> <p>1 Q. Sir, you would use the computer that was in the</p> <p>2 office?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. And, sir, at any point in time did you</p> <p>5 ever show Ms. Fernandez anything that you were looking at</p> <p>6 on Facebook?</p> <p>7 A. No, I never showed her anything.</p> <p>8 Q. Okay. Did you ever show her anything on your</p> <p>9 screen, on the computer screen, that you may have been</p> <p>10 looking at --</p> <p>11 A. No, I did not.</p> <p>12 MS. FISHER: Objection.</p> <p>13 BY MR. CALLISTE:</p> <p>14 Q. Sir, do you write for blogs or a vlog, vlogs?</p> <p>15 MS. FISHER: Objection.</p> <p>16 THE WITNESS: No.</p> <p>17 BY MR. CALLISTE:</p> <p>18 Q. Have you ever written for vlogs?</p> <p>19 A. No.</p> <p>20 MS. FISHER: Objection.</p> <p>21 BY MR. CALLISTE:</p> <p>22 Q. Sir, the music that you indicated you played</p> <p>23 from the office -- or you played in the office every now</p> <p>24 and again, sir, can you tell me if any of that music came</p> <p>25 from Facebook or from your social media page?</p>	<p style="text-align: right;">Page 182</p> <p>1 MS. FISHER: Objection.</p> <p>2 THE WITNESS: Yes.</p> <p>3 BY MR. CALLISTE:</p> <p>4 Q. And is your Facebook screen name or your</p> <p>5 account name the same name that it was back in 2018,</p> <p>6 2019?</p> <p>7 MS. FISHER: Objection.</p> <p>8 THE WITNESS: I don't know.</p> <p>9 BY MR. CALLISTE:</p> <p>10 Q. Have you ever had multiple screen names or</p> <p>11 screen identities on Facebook?</p> <p>12 MS. FISHER: Objection.</p> <p>13 BY MR. CALLISTE:</p> <p>14 Q. More than one.</p> <p>15 A. Not to my recollection.</p> <p>16 Q. Okay. As you sit here today, you can't recall</p> <p>17 what your screen name is?</p> <p>18 MS. FISHER: Objection.</p> <p>19 THE WITNESS: The only name I use is Ira</p> <p>20 Greene.</p> <p>21 BY MR. CALLISTE:</p> <p>22 Q. Okay. Sir, do you know if Ms. Fernandez --</p> <p>23 putting aside -- well, withdrawn.</p> <p>24 Do you know if Ms. Fernandez ever made any</p> <p>25 complaints about you personally to anyone else at Wenig</p>